

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Misc. No. 17-151-LPS
	)	
BOLIVARIAN REPUBLIC OF	)	
VENEZUELA,	)	
	)	
Defendant.	)	

**SPECIAL MASTER’S RESPONSE, INCLUDING REVISED PROPOSED SCHEDULE,  
TO THE VENEZUELA PARTIES’ MOTION FOR RECONSIDERATION OF THE  
COURT’S ORDER SETTING DEADLINES FOR BRIEFING AND DISCOVERY**

Robert B. Pincus, in his capacity as special master for the United States District Court for the District of Delaware in the above-captioned case (the “**Special Master**”),<sup>1</sup> submits this response to the Venezuela Parties’ Motion for Reconsideration of the Court’s Order Setting Deadlines for Briefing and Discovery, D.I. 1803 (the “**Motion**”).

In response to the Motion, the Special Master engaged in further discussions with the relevant parties in an effort to reach consensus on a schedule. The Special Master is pleased to advise the Court that he reached an agreement with the Venezuela Parties, the other Sale Process Parties, Red Tree, and Gold Reserve on the revised schedule proposed below. The Special Master understands that if the Court adopts this schedule, the Venezuela Parties will withdraw the Motion.

Compared to the Special Master’s previous proposal, the most significant change is that any objector would be required to initially file a notice of its objections—including a sufficiently

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<sup>1</sup> All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (D.I. 481) (the “**Sale Procedures Order**”).

detailed description of such objections—on July 7, 2025, and subsequently file a memorandum of law in support of its objections on July 23, 2025. The Special Master respectfully requests that the Court adopt the following schedule:

<b>Event</b>	<b>Special Master’s Proposed Deadline</b>
Deadline for the Special Master to submit his Final Recommendation together with any supporting materials	Wednesday, July 2 (“ <b>Rec</b> ”)
Deadline to serve written discovery on the party (or parties) whose bid is selected as the Final Recommendation	Monday, July 7 (Rec + 5 days)
Opening expert reports due	Monday, July 7 (Rec + 5 days)
Deadline for the filing of any notice of objections to the Special Master’s Final Recommendation. The notice must state with particularity the bases for each objection known at that time. Parties may only seek discovery that is reasonably related to the issues raised in the initial notices of objections that are filed on July 7.	Monday, July 7 (Rec + 5 days)
Deadline for any Competing Objector to disclose its own bid materials (such materials to be commensurate with those disclosed by the Special Master of the recommended bid) <sup>2</sup>	Wednesday, July 9 (Rec + 7 days)
Deadline to serve written discovery on a Competing Objector	Friday, July 11 (Rec + 9 days)
Deadline to serve responses and objections for discovery requests served after the Final Recommendation	Tuesday, July 15 (Rec + 13 days)
Deadline to meet and confer regarding the scope of discovery to be produced in response to discovery requests served after submission of the Final Recommendation	Wednesday, July 16 (Rec + 14 days)

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<sup>2</sup> A Competing Objector is any party objecting to the Final Recommendation on the basis that its bid should have been selected as the Final Recommendation instead.

<b>Event</b>	<b>Special Master's Proposed Deadline</b>
Deadline to complete document productions in response to discovery requests served before the submission of the Final Recommendation and substantially complete document productions in response to discovery requests served after the submission of the Final Recommendation	Friday, July 18 (Rec + 16 days)
Deadline to serve witness disclosures pursuant to FRCP 26(a)(3)	Friday, July 18 (Rec + 16 days)
Deadline to notice witness depositions	Monday, July 21 (Rec + 19 days)
Deadline to serve responsive expert reports	Monday, July 21 (Rec + 19 days)
Deadline for the filing of memoranda in support of any objections to the Special Master's Final Recommendation	Wednesday, July 23 (Rec + 21 days)
Deadline to serve reply expert reports, if any	Friday, July 25 (Rec + 23 days)
Conclusion of the discovery period	Thursday, July 31 (Rec + 29 days)
Deadline for the filing of responses to objections to the Special Master's Final Recommendation	Wednesday, August 6 (Rec + 35 days)
Deadline for the filing of replies regarding any objections to the Special Master's Final Recommendation	Tuesday, August 12 (Rec + 41 days)
Deadline for the Special Master to submit Joint Status Report <sup>3</sup>	Wednesday, August 13 (Rec + 42 days)
Deadline to disclose exhibits pursuant to FRCP 26(a)(3)	Wednesday, August 13 (Rec + 42 days)
Deadline for the filing of sur-replies to replies regarding any objections to the Special Master's Final Recommendation (only to the extent new arguments are raised in reply briefing)	Friday, August 15 at 12:00 p.m. ET (Rec + 44 days)

<sup>3</sup> The Court previously ordered that the Special Master's Joint Status Report should include a witness list and allocation of time across parties. D.I. 1741 ¶ 3.

Event	Special Master's Proposed Deadline
Deadline to serve objections to FRCP 26(a)(3) exhibit disclosures	Friday, August 15 (Rec + 44 days)
Commencement of the Sale Hearing	Monday, August 18 (Rec + 47 days)

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

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Dated: June 13, 2025  
12300186 / 21202.00001

By: /s/ Myron T. Steele

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*Counsel for Special Master Robert B. Pincus*

**SO ORDERED.**

June 13, 2025  
Wilmington, Delaware



HONORABLE LEONARD P. STARK  
UNITED STATES DISTRICT COURT